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July 5, 2017

BY ECF AND EMAIL

The Honorable Katherine B. Forrest
United States District Court
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2230
New York, New York 10007

Re: *Aquazzura Italia SRL v. Ivanka Trump et al.*, No. 16-cv-4782(KBF)
(Our Ref.: AQUZ USA TC-1602071)

Dear Judge Forrest:

We represent Plaintiff Aquazzura Italia SRL (“Plaintiff”) in this action. We write on behalf of all parties pursuant to Your Honor’s Individual Rules I.B and G to request clarification of the Court’s June 23, 2017 Order. In that Order, the Court sua sponte extended discovery to the end of October 2017, but stated that it was “solely for the purpose of allowing this deposition to occur.” The parties are uncertain whether the Court meant that for the sole purpose of allowing Ms. Trump’s deposition to occur all dates for discovery are extended, or if the Court meant that all fact discovery must still be completed by September 22, 2017, and Ms. Trump’s deposition may take place beyond that date.

If the latter, we note that expert reports could be due before Ms. Trump’s fact deposition. Accordingly, the parties jointly request that the Court extend all discovery dates to accommodate Ms. Trump’s deposition taking place by the end of October, with expert reports to follow on the same or a similar timeline as previously ordered by the Court. The parties agree that neither will be prejudiced by extending the fact discovery period through the end of October, and re-setting the expert discovery deadlines accordingly.

The parties do not make this request for the purpose of delay, but rather to avoid prejudice and to ensure that discovery takes place in an orderly fashion.

Respectfully submitted,



John P. Margiotta

cc: All Counsel via ECF